United States District Court - Southern District of Texas- Houston Division FISHER v. HALLIBURTON - Civil Action No. H-05-1731 **CHART - Discovery Propounded by Defendants** 

Plaintiff	Documents Demands By All Defendants	INTERROGATORIES By Halliburton,KBR, SEII KBRSI, & KBRII	RFA W/ Exhibits	Deposition
Bell, Marjorie (Tim Bell mother) Tunstall, Cha Sadie (Tim Bell daughter)	Set 1 (2005) - 86 Requests	HAL 20 Interrogatories KBR 20 Interrogatories SEII 23 Interrogatories	24 Admissions 38 pages of exhibits	3 hrs : 21 min
(		Total = 63 Interrogatories (2005)		
	Set 2 (2010)	KRRSI -19 Interrogatories (2010)		
	- 10 Requests	NUNOI - 12 IIIIGII OGAMIES (2010)		
	Total Marjorie Req. = 96	Total Marjorie Interrogatories = 75	Total RFA-Bell = 24/38 pp	Depo = 3hrs 21 min.
Caffey, Timothy (Tim Bell son)	64 Requests (2010)	KBRSI & KBRI- 36 Interrogatories(2010)		
Caffey, Nicholas (Tim Bell son)	64 Requests (2010)			
	Total Bell Requests = 160	Total Bell Family Interrogatories = 111	Total Bell RFA = 24/38 pp	
Blackwood, James	70 Requests (2010)	KBRSI & KBRI Interrogatories - 36 (2010)	98 Admissions 380 pages of exhibits	6 hr. 06 min
	i otal Req. James = 70	Total James Blackwood Interrogs = 36	Total RFA James = 98/380p	

**EXHIBIT** 

	Total RFA Brezovay - 98/380	Total Interrogatories Brezovay = 80	Total RFP Brezovay = 92	
		KBRSI 12 Interrogatories (2010)	Set 2 = 10 Requests (2010)	
3 hrs 53 min	98 Admissions 380 pages of exhibits	HAL 21 Interrogatories KBR 23 Interrogatories SEII 24 Interrogatories Total Interrogatories = 68 (2005)	Set 1 = 81 Requests (2005)	Brezovay, Michael
	Total Bradley RFA -25/ 38pp	Total Interrogs to Bradley = 75	Total RFP to Bradley = 96	
		KBRSI 12 Interrogatories (2010)	Set 2 - 10 Requests (2010)	
4 hrs : 48 min	25 Admissions 38 pages of exhibits	KBR 20 Interrogatories SEII 23 Interrogatories Total = 63 Interrogatories (2005)	- 86 Requests (2005)	Bradley, Jackson
		HAL 20 Interrogatories	Set 1	
	Total Blackwood RFA - 98/380 pp	Total Interrogs to Blackwoods = 73	Total RFP Blackwood =135	
39 mins		KBRSI & KBRI Interrogatories - 37 (2010)	65 Requests (2010)	Blackwood, Joann
Deposition	RFA W/ Exhibits	INTERROGATORIES By Halliburton,KBR, SEII KBRSI, & KBRII	Documents Demands By All Defendants	Plaintiff

		Total Interrogatories - Lisa = 64	Total Requests- Lisa = 72	
		KBRSI 12 Interrogatories (2010)	Set 2 (2010) = 10 Requests	
3 hrs:58 min	25 Admissions 38 pages of exhibits	HAL 20 Interrogatories KBR 19 Interrogatories SEII 13 Interrogatories Total = 52 Interrogatories (2005)	Set 1 (2005) = 62 Requests	Hulett, Lisa (Steve Hulett daughter)
	Total Fisher RFA -25 /38 pp	KBRSI - 12 Interrogatories (2010)  Total Interrogs Kristen = 64  Total Interrogs to Fishers = 139	Total Req. Kristen = 10  Total RFP to Fisher = 119	
1 hr 21 min		HAL 20 Interrogatories KBR 19 Interrogatories SEII 13 Interrogatories Total = 52 Interrogatories (2005)	Set 2 - 10 Requests (2010)	Fisher, Kristen
	Total RFA Fisher =25/38pp	KBRSI - 12 Interrogatories (2010)  Total Interrogs Ingrid Fisher = 75	Set 2 (2010) = 10 Requests  Total RFP Ingrid = 109	
3 hrs 47 min	25 Admissions 38 pages of exhibits	HAL 21 Interrogatories KBR 20 Interrogatories SEII 22 Interrogatories Total = 63 Interrogatories (2005)	Set 1 (2005) = 99 Requests	Fisher, Ingrid Fisher, Kristen
Deposition	RFA W/ Exhibits	INTERROGATORIES By Halliburton,KBR, SEII KBRSI, & KBRII	Documents Demands By All Defendants	Plaintiff

	Total RFA - Hulett = 25/38 pp	Total Interrogs - All Huletts = 265	Total RFP All Huletts = 390	
		KBRSI 12 Interrogatories (2010)  Total Interrogatories - Alex = 65	Set 2 (2010) = 10 Requests Total RFP Alexandria = 106	
1 hr : 22 min		HAL 20 Interrogatories KBR 20 Interrogatories SEII 13 Interrogatories Total = 53 Interrogatories (2005)	Set 1 (2005) = 96 Requests	Slingerland, Alexandria (Steve Hulett daughter)
		KBRSI 12 Interrogatories (2010)  Total Interrogatories - Jack = 64	Set 2 (2010) = 10 Requests Total RFP- Jack = 106	
1 hr : 18 min		HAL 20 Interrogatories KBR 19 Interrogatories SEII 13 Interrogatories Total = 52 Interrogatories (2005)	Set 1 (2005) = 96 Requests	Slingerland, Jack (Steve Hulett son)
	Total RFA- Hollie -25 /38 pp	KBRSI 12 Interrogatories (2010)  Total Interrogatories - Hollie = 72	Set 2 (2010) = 10 Requests Total Requests-Hollie = 106	
4 hours 28 min	25 Admissions 38 pages of exhibits	HAL 20 Interrogatories KBR 20 Interrogatories SEII 20 Interrogatories Total = 60 Interrogatories (2005)	Set 1 (2005) = 96 Requests	Hulett, Hollie (Steve Hulett wife)
Deposition	RFA W/ Exhibits	INTERROGATORIES By Halliburton,KBR, SEII KBRSI, & KBRII	Documents Demands By All Defendants	Plaintiff

Plaintiff Howell, Nelson Johnson, April	Set 1(2005) = 81 Requests  Total RFP - Howell - 91  Set 2 (2010) = 10 Requests  Set 2 (2010) = 10 Requests  Set 2 (2010) = 10 Requests  Set 2 (2010) = 81 Requests  (with Naomi Lester)	HAL 22 Interrogatories KBR 23 Interrogatories SEII 25 Interrogatories (2005)  Total = 70 Interrogatories (2020)  KBRSI 12 Interrogatories (2020)  HAL 20 Interrogatories KBR 19 Interrogatories SEII 13 Interrogatories SEII 13 Interrogatories SEII 13 Interrogatories (2010)  KBRSI 12 Interrogatories (2010)  HAL 22 Interrogatories SEII 25 Interrogatories SEII 25 Interrogatories Total = 70 Interrogatories (2005)	98 Admissions 380 pages of exhibits  Total RFA-Howell = 98/380 pp  25 Admissions 38 pages of exhibits  98 Admissions 98 Admissions 380 pages of exhibits	Deposition  2 hrs : 46 min  6 hours 41 min
Johnson, April	= 61 Requests  Set 2 (2010)  = 10 Requests	Total = 52 Interrogatories (2005)  KBRSI 12 Interrogatories (2010)		
	- COOL	HAL 2 KBR 2		6 hours 41 mins
Lester, Jackie	Set (2005) = 81 Requests (with Naomi Lester)	Total = 70 Interrogatories (2005)		
	Set 2 (2010) =10 Requests	KBRSI 12 Interrogatories (2010)		

		Total = 60 Interrogatories (2005)	= 82 Requests	Parker, Lois
1 hr : 26 min	25 Admissions 38 pages of exhibits	HAL 20 Interrogatories KBR 20 Interrogatories SEII 20 Interrogatories	Set 1 (2005)	
	Total RFA Montague =25/28pp	Total Interrogs Montague = 86	Total Req. Montague = 106	
		Total Interrogatories Jacquelyn = 12	Total Req. Jacquelyn = 10	
1 hr : 09 min		KBRSI 12 Interrogatories (2010)	Set 1 (2010) = 10 Requests	Montague, Jacquelyn
		iodi illellogawies belsy	i otal Ked: Detsy – so	
			Total Reg Betsy = 96	
		KBRSI - 12 Interrogatories (2010)	Set 2 (2010)	
		Total = 62 interrogatories (2005)	oo Ixeducese	
5 hrs : 27 min	25 Admissions 38 pages of exhibits	HAL 22 Interrogatories KBR 20 Interrogatories SEII 20 Interrogatories	Set 1 (2005)	Montague, Betsy Montaque, Jacquelyne
	Total RFA-Lester = 98&380pp	Total Interrogatories - Lesters = 116	Total RFP -Lesters = 101	
		Total Interrogatories - Naomi = 34	Total RFP - Naomi = 10	
		Total = 34 interrogatories	Set z - 10 Requests (2010)	Lester, Naomi
1 hour 14 mins		Set 1 - 22 Interrogatories Set 2 - 12 Interrogatories		
		Total Interrogatories - Jackie = 82	Total RFP- Jackie = 91	
Deposition	RFA W/ Exhibits	INTERROGATORIES By Halliburton,KBR, SEII KBRSI, & KBRII	Documents Demands By All Defendants	Plaintiff

		Total = 70 Interrogatories (2005)	= 81 Requests	Stanley, Keith
4 hrs : 47 min	98 Admissions 380 pages of exhibits	HAL 22 Interrogatories KBR 23 Interrogatories SEII 25 Interrogatories	Set 1 (2005)	
	Total RFA Sanchez=98/380pp	Total Interrogatories Sanchez = 82	Total Req. Sanchez = 91	
		Section (=0.0)	= 10 Requests	
		KRRSI 12 Interrogatories (2010)	Set 2 (2010)	
		Total = 70 Interrogatories (2005)	= 81 Requests	Sanchez, Edward
4 hrs : 11 min	98 Admissions 380 pages of exhibits	HAL 25 Interrogatories KBR 23 Interrogatories SEII 22 Interrogatories	Set 1 (2005)	
	Total RFA Peterson=98/380pp	Total Interrogatories Peterson = 82	Total Peterson Req. = 91	
		KBRSI 12 Interrogatories	Set 2 (2010) = 10 Requests	
		Total = 70 interrogatories (2005)	= 81 Requests	Peterson, William
6 hrs : 07 mins	98 Admissions 380 pages of exhibits	HAL 22 Interrogatories KBR 23 Interrogatories SEII 25 Interrogatories	Set 1 (2005)	
	Total RFA Parker = 25/38pp	Total Parker Interrogatories = 72	Total Req. Parker = 92	
		KBRSI 12 Interrogatories (2010)	Set 2 (2010) = 10 Requests	
Deposition	RFA W/ Exhibits	INTERROGATORIES By Halliburton,KBR, SEII KBRSI, & KBRII	Documents Demands By All Defendants	Plaintiff

	Wood, Danny		Tollison, Rick		Stannard, Ray		Plaintiff
Set 2 (2010) = 10 Requests	Set 1(2005) = 81 Requests	Set 2 (2010) = 10 Requests  Total ReqTollison-91	Set 1 (2005) = 81 Requests	Set 2 = 10 Requests (2010) Total Req Stannard = 91	Set 1 = 81 Requests (2005)	Set 2 (2010) =10 Requests Total Req -Stanley = 91	Documents Demands By All Defendants
KBRSI 12 Interrogatories (2010)	HAL 22 Interrogatories KBR 23 Interrogatories SEII 25 Interrogatories Total = 70 Interrogatories (2005)	KBRSI 12 Interrogatories (2010)  Total Interrogs -Tollison = 82	HAL 22 Interrogatories KBR 23 Interrogatories SEII 25 Interrogatories Total = 70 Interrogatories (2005)	KBRSI 12 Interrogatories (2010)  Total Interrogatories-Stannard = 82	HAL 22 Interrogatories KBR 23 Interrogatories SEII 25 Interrogatories Total = 70 Interrogatories (2005)	KBRSI 12 Interrogatories (2010)  Total Interrogatories-Stanley = 82	INTERROGATORIES By Halliburton,KBR, SEII KBRSI, & KBRII
	98 Admissions 380 pages of exhibits	Total RFA Tollison = 980/380pp	98 Admissions 380 pages of exhibits	TotalRFA Stannard = 98/380pp	98 Admissions 380 pages of exhibits	Total RFA-Stanley = 98/380 pp	RFA W/ Exhibits
	3 hrs : 54 min				5 hrs : 25 min		Deposition

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	Total RFA -Wood = 98/380 pp	Total Interrogatories - Wood = 82 Total RFA -	Total Req -Wood = 91	
Deposition	RFA W/ Exhibits	Documents Demands By INTERROGATORIES By Halliburton,KBR, All Defendants SEII KBRSI, & KBRII	Documents Demands By All Defendants	Plaintiff